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September 8, 2003

Via U.S. Mail and e-mail

Marianne Lamont Horinko
Acting Administrator
U.S. Environmental Protection Agency (EPA)
P.O. Box 1473
Merrifield, VA 22116

**Re: Rubber and Plastic Additives (RAPA) Panel
HPV Chemical Challenge Program Submission
Substituted p-Phenylenediamines Category
Revised Robust Summary for CAS No. 68953-84-4**

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Dear Ms. Horinko:

On July 17, 2003 the RAPA Panel¹ of the American Chemistry Council submitted a revised test plan and revised robust summaries for the Substituted p-Phenylenediamines category. The category includes five of the 37 chemicals RAPA is voluntarily sponsoring in the Program. These revised documents have been posted on EPA's HPV Challenge Program web site (<http://www.epa.gov/chemrtk/sbphnyld/c13383tc.htm>).

It has recently come to our attention that one of the posted revised robust summary files (for 1,4-Benzenediamine, N,N'-mixed Ph and toyl derivative; CAS number 68953-84-4) incorrectly indicates that the biodegradation study for the chemical was conducted under anaerobic conditions. In fact, the study was conducted under aerobic conditions. As this mistake affects interpretation of results of the study, we request that the robust summary file for CAS number 68953-84-4 submitted on July 17 be replaced with the attached corrected file. The test plan submitted on July 17 is not affected by this change.

This submission is also being sent electronically to the following e-mail addresses: Oppt.nrc@epa.gov and Chem.rtk@epa.gov. If you require additional information, please contact the RAPA Panel's technical contact, Dr. Anne P. LeHuray at (703) 741-5630 or anne_lehuray@americanchemistry.com.

Sincerely yours,

Attachment

¹ The RAPA Panel includes the following member companies: Alco Chemicals; Bayer Polymers LLC.; Ciba Specialty Chemicals Corporation; Crompton Corporation; Eliokem, Inc.; Flexsys America L.P.; The Goodyear Tire & Rubber Company; The Lubrizol Corporation; Noveon, Inc.; and, R.T. Vanderbilt Company, Inc.



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